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7 Attorneys for Plaintiffs

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10 UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

11 MARK J. HANSEN, MONICA S. )  
12 HANSEN, BERNIE L. HANSEN, KELLY )  
A. HANSEN, CARL J. BARTALDO, )  
13 DONALD R. LANCASTER, CONSTANCE )  
A. LANCASTER, and SHASTA )  
14 GENERAL ENGINEERING, INC., a )  
California corporation, )

15 Plaintiffs, )

16 vs. )

17 ARTHUR SCHUBERT; JOYCE BARAL; )  
18 BERNIE RENTERIA; R. GARCIA; GREG )  
A. ZIEGLER; VINCENT ZAMBRANA; )  
19 STEPHANIE MCCALL; SHON HILL; )  
CRAIG BURSON; K.R. ERICSON; and )  
20 DOES 1 through 50, inclusive, )  
Defendants. )

Civil Action No.CIV-S-02-0850 FCD GGH

**STIPULATION AND ORDER  
CONTINUING PRETRIAL AND TRIAL  
DATES**

**“AS MODIFIED”**

22 WHEREAS this case was stayed from June 10, 2003 to December 15, 2004; and

23 WHEREAS plaintiffs filed a supplemental complaint on March 8, 2005; and

24 WHEREAS there has been a substantial delay in the defendants’ disclosure of documents  
25 because of the need to secure approval from the District Attorney of Shasta County and the office of  
26 the United States Attorney for the Eastern District of California; and

27 WHEREAS the parties may still have disputes regarding the accessibility of plaintiffs to  
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documents which defendants now believe are privileged and/or confidential; and

WHEREAS the disputes as to documents has substantially delayed the completion of existing depositions and the initiation of new ones; and

WHEREAS the discovery cutoff is currently set for October 7, 2005 but cannot be fairly and timely accomplished; and

WHEREAS defendants counsel has a substantial trial schedule for the remainder of 2005,

THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

(1) that the discovery cutoff be postponed to April 7, 2006;

(2) that the date for disclosure of experts be set for April 10, 2006 disclosure of rebuttal experts set for April 24, 2006, and the expert discovery cutoff for May 8, 2006;

(3) that dispositive motions be heard no later than July 21, 2006;

(4) that the date for the joint pre-trial conference statement be set over to September 22, 2006, the pre-trial conference be set for September 29, 2006 at 1:30 p.m., and the trial be held commencing November 28, 2006, 9:00 a.m.

LAW OFFICES OF MICHAEL S. SORGEN

Dated: September 9, 2005

By \_\_\_\_\_  
Michael S. Sorgen  
Attorneys for Plaintiffs

Dated: September 9, 2005

By \_\_\_\_\_  
Gary Binkerd  
Deputy Attorney General

APPROVED AND SO ORDERED:

Dated: September 15, 2005

By /s/ Frank C. Damrell Jr.  
Honorable Frank C. Damrell Jr.  
United States District Judge